

FairPoint Communications, Inc.
State of New Hampshire
Docket No. DT 07-011

Respondent: Peter G. Nixon;
Steve Yusko
Title: Chief Operating Officer;
Vice President, Marketing &
Product Development

REQUEST: Office of Consumer Advocate
Group II

DATED: April 13, 2007

ITEM: OCA 2-38 Re page 29.

- a. Is it FairPoint's position that it is not required to provide stand-alone DSL to its customers?
- b. Does FairPoint plan to provide stand-alone DSL to its customers?
- c. Provide any and all documents, memoranda, marketing studies and/or other documents prepared by or on behalf of FairPoint regarding the deployment of DSL either as part of the proposed transaction or in the context of its existing operations.

REPLY: **OBJECTION:** FairPoint objects to Data Request 2-38(c) on the grounds that it is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. [Objection served April 20, 2007.]

Subject to and without waiving this objection, FairPoint responds as follows:

- a. FairPoint will provide stand-alone DSL.
- b. FairPoint will provide stand-alone DSL.
- c. See Attachment FPNH 0347 – FPNH 0348. Attachment CFPNH 0381 – CFPNH 0388 is being produced under seal and pursuant to RSA 378:43 and the Protective Agreement in this Docket